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13 *Attorneys for Defendants*

14 *Reed Hein & Associates, LLC dba Timeshare Exit Team,
15 Brandon Reed, Trevor Hein, Thomas Parenteau, and
16 Happy Hour Media Group, LLC*

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17 UNITED STATES DISTRICT COURT

18 DISTRICT OF NEVADA

19 DIAMOND RESORTS CORPORATION, a)
20 Maryland corporation,) Case No.: 2:17-cv-03007-APG-VCF

21 vs.)
22 Plaintiffs,)

23 REED HEIN & ASSOCIATES, LLC, d/b/a)
24 TIMESHARE EXIT TEAM, a Washington limited)
liability company; BRANDON REED, an individual)
and citizen of the State of Washington; TREVOR)
HEIN, an individual and citizen of Canada;)
THOMAS PARENTEAU, an individual and citizen)
of the State of Washington; HAPPY HOUR MEDIA)
GROUP, LLC, a Washington limited liability)
company; MITCHELL REED SUSSMAN, ESQ.)
d/b/a THE LAW OFFICES OF MITCHELL REED)
SUSSMAN & ASSOCIATES, an individual citizen)
of the State of California; SCHROETER,)
GOLDMARK & BENDER, P.S. A Washington)
professional services corporation; and KEN B.)
PRIVETT, ESQ., a citizen of Oklahoma,)

25 Defendants.)

26 **STIPULATION AND ORDER
REGARDING DEADLINE TO
FILE RESPONSE TO
PLAINTIFF'S SECOND MOTION
TO COMPEL**

27 **[First Stipulation]**

28 Pursuant to Local Rules IA 6-1, IA 6-2, and 7-1, Plaintiff DIAMOND RESORTS U.S.
COLLECTION DEVELOPMENT, LLC ("Plaintiff") and Defendant REED HEIN &
ASSOCIATES, LLC d/b/a TIMESHARE EXIT TEAM ("Defendant") (collectively, the

1 "Parties") by and through their respective attorneys of record, hereby jointly stipulate as stated
2 below.

3 **STIPULATION**

4 1. On August 20, 2020, Plaintiff filed a Second Motion to Compel Discovery from
5 Reed Hein & Associates, LLC and For Sanctions (the "Motion"). ECF No. 289.

6 2. The current deadline for response or opposition to the Motion is September 2,
7 2020.

8 3. In order to adequately address and brief the issues presented in the Motion, the
9 Parties agree that Defendant's deadline to respond to the Motion be extended to September 11,
10 2020.

11 4. This is the Parties first request for extension of this deadline, and it is not intended
12 to cause any delay or prejudice to any party. Plaintiff does not object to the requested extension.

13 Dated this 2nd day of September, 2020.

14 **GREENSPOON MARDER, LLP**

15 /s/ Michelle E. Durieux
16 RICHARD W. EPSTEIN, ESQ.
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Exit Team, Brandon Reed, Trevor Hein,
Thomas Parenteau, and Happy Hour Media
Group, LLC

25 **ORDER**

26 IT IS SO ORDERED.

27 
UNITED STATES MAGISTRATE JUDGE
28 DATED: 9-3-2020

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